

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | |
|---------------------------------|-------------------------------|
| In Re: | : Bankruptcy No. 19-17544-elf |
| Christopher R. Kreamer | : Chapter 13 |
| Debtor | : |
| | : |
| Bridgecrest Credit Company, LLC | : |
| Movant | : |
| | : |
| vs. | : |
| | : |
| Christopher R. Kreamer | : |
| Debtor/Respondent | : |
| and | : |
| William C. Miller, Esquire | : |
| Trustee/Respondent | : |

OBJECTION TO CONFIRMATION OF THE AMENDED PLAN

Bridgecrest Credit Company, LLC (“Movant”), by its attorneys, Hladik, Onorato & Federman, LLP, objects to confirmation of the Amended Chapter 13 Plan of Debtor, Christopher R. Kreamer (“Debtor”), as follows:

1. As of the bankruptcy filing date of December 03, 2019, Movant holds a secured Claim against the Debtor’s Vehicle, a 2012 CHREVOLET SONIC, VIN # 1G1JF5SB8C4205487 (the “Vehicle”).
2. On January 09, 2020, Movant filed a Proof of Claim with a total secured claim in the amount of \$7,726.63, with an interest rate of 18.840%.
3. The Amended Plan proposes to pay the total claim of \$7,726.63, with an interest rate of only 0.00%.
4. The Amended Plan violates of 11 USC § 1325(a)(5)(B)(ii) by not providing for Movant to receive the full value of its claim, as the debt was incurred on August 18, 2019, which is within 910 days of the filing of the instant bankruptcy.
5. Any attempt by the Debtor to modify any portion of this Contract with Movant should be denied.

6. Movant objects to the feasibility of the Amended Plan under 11 U.S.C. § 1325(a)(6). The Amended Plan proposed by Debtor is not feasible. Movant requests that the bankruptcy case either be converted to a Chapter 7 or be dismissed pursuant to 11 U.S.C. § 1307.

WHEREFORE, Movant respectfully requests that this Honorable Court deny confirmation of the Debtor's Amended Chapter 13 Plan.

Respectfully submitted,

Dated: 03/05/2020

/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
Hladik, Onorato & Federman, LLP
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**CERTIFICATE OF MAILING OF OBJECTION TO THE PROPOSED
PLAN TO PARTIES IN INTEREST**

I, Danielle Boyle-Ebersole, Esquire, attorney for Bridgecrest Credit Company, LLC (“Movant”), certify that I served a copy of the attached Objection to the Plan to the parties below on 03/05/2020:

Michael W. Gallagher, Esquire
Via Electronic Filing
Attorney for Debtors

William C. Miller, Esquire
Via Electronic Filing
Trustee

Christopher R. Kreamer
507 Columbia Avenue
Lansdale, PA 19446
Via First Class Mail
Debtors

Date: 03/05/2020

Respectfully Submitted,
/s/Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
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North Wales, PA 19454
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